

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

SHAW-NAE DIXON, THOMAS CASATELLI,  
JEANETTE RIVERA, NATALIA YAKUBOVA,  
CHRIS KING, ALISON MARCHESE, on behalf  
of AM, JM, and MMV (her minor children),  
WILLIAM MORRIS, GEORGE KABBEZ,  
SHAW-NAE'S HOUSE, LLC, SALTY DOG  
RESTAURANT, LTD, PER TAVERN CORP.  
d/b/a THE KETTLE BLACK, CARGOSTORK  
PARTIES, INC. d/b/a DO ME A FAVOR, and  
INDEPENDENT RESTAURANT OWNERS  
ASSOCIATION RESCUE, INC.,

Plaintiffs,

v.

ERIC ADAMS, in his official capacity as Mayor  
of the City of New York and as successor to Bill  
de Blasio, and THE CITY OF NEW YORK,

Defendants.

**Civil Action No. 21-CV-5090 (BMC)**

**NOTICE OF MOTION SEEKING  
LEAVE TO FILE AMENDED  
COMPLAINT PURSUANT TO  
*Fed. R. Civ. P. 15(a)(2)*.**

**PLEASE TAKE NOTICE** that the undersigned, attorneys for the Plaintiffs, shall move  
the Court for an Order, granting leave to file an Amended Complaint in this matter pursuant to  
*Fed. R. Civ. P. 15(a)(2)*.

**PLEASE TAKE FURTHER NOTICE** that in support hereof, the undersigned shall rely  
upon the accompanying Declaration of Ronald A. Berutti, and a Brief.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested, and that a  
proposed form of Order accompanies this motion.

*s/ Ronald A. Berutti*

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Dated: Brooklyn, New York  
July 5, 2022